

**No. PD-0677-21**

IN THE  
TEXAS COURT  
OF CRIMINAL APPEALS

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FILED  
COURT OF CRIMINAL APPEALS  
1/13/2022  
DEANA WILLIAMSON, CLERK

**HAROLD GENE JEFFERSON**

*Petitioner,*

v.

**THE STATE OF TEXAS,**

*Respondent.*

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On Petition for Discretionary Review from the Eleventh Court of Appeals in  
Eastland, Texas,  
Cause No. 11-18-00184-CR

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**MOTION TO EXTEND TIME TO FILE APPELLANT'S BRIEF**

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**Submitted by:**

Blizzard & Zimmerman, P.L.L.C., 441 Butternut St., Abilene, Texas 79602,  
Tel. 325-676-1000, Fax. 325-455-8842, Jacob Blizzard for Appellant.

## **TO THE HONORABLE COURT OF APPEALS:**

Now comes HAROLD GENE JEFFERSON, Appellant in the above styled and numbered cause, and moves this Court to grant an extension of time to file appellant's brief, pursuant to Rule 38.6 of the Texas Rules of Appellate Procedure, and for good cause shows the following:

1. This case was on appeal from the 104th Judicial District Court of TAYLOR County, Texas.
2. The case below was styled the STATE OF TEXAS vs. HAROLD GENE JEFFERSON, and numbered 20708-B.
3. Appellant was convicted of three counts of Sexual Assault of a Child and one count of Indecency with Child by Sexual Contact.
4. On June 29, 2018, Appellant was sentenced to 35 years for count 1; 45 years for counts 2 and 3; and 25 years for count 4.
5. Notice of appeal was given on July 16, 2018.
6. The clerk's record was filed on October 18, 2018; the reporter's record was filed on November 12, 2018.
7. The appellate brief was filed July 12, 2019.
8. The state's brief was filed on October 22, 2019.
9. The Court affirmed the conviction on June 17, 2021.

10. Appellant's Motion for Rehearing was filed on August 2, 2021.
11. Appellant's Motion for Rehearing was denied on August 5, 2021.
12. Appellant's Petition for Discretionary Review was filed on October 19, 2021.
13. Appellant's Petition for Discretionary Review was granted on December 8, 2021
14. Appellant's Brief is due January 7, 2022.
15. Appellant requests an extension of time of 14 days from the present date, i.e. January 21, 2022.
16. No extensions to file Appellant's Brief have been filed in this cause by Appellant's counsel.
17. Counsel prepared for and defended his client in a jury trial in *The State of Texas vs. Ngozika Ughanze*; Cause No. 21477-B on December 13 through December 15, 2021. Counsel also prepared a Response to the United States' Motion in *USA v. Casio*, Cause No. 21-10440, which was timely submitted on December 17, 2021. Counsel also attended a phone PSR in *USA v. Schuder*, Cause No. 6:21-cr-00035-H-BU, and *USA v. Mawby*, Cause No. 1:21-cr-00019-H-BU. Additionally, Counsel attended routine court appearances in and around Taylor County, as well as visited clients in detention facilities in Taylor and surrounding counties. For the reasons above, Counsel has not had adequate time to prepare Appellant's Brief,

Counsel is requesting a 14-day extension.

**WHEREFORE, PREMISES CONSIDERED,** Appellant respectfully requests an extension of 14 days, i.e. until January 21, 2022 to file a Brief.

Respectfully submitted,

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By: /s/ Jacob Blizzard  
Jacob Blizzard  
State Bar No. 24068558

**CERTIFICATE OF SERVICE**

This is to certify that on January 7, 2022, a true and correct copy of the above and foregoing document was served on the District Attorney's Office, TAYLOR County, via e-file.

By: /s/ Jacob Blizzard  
Jacob Blizzard

### **Automated Certificate of eService**

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Jacob Blizzard on behalf of Jacob Blizzard  
Bar No. 24068558  
Jacob.Blizzard@blizzardlawfirm.com  
Envelope ID: 60611938  
Status as of 1/11/2022 1:52 PM CST

Associated Case Party: HaroldGeneJefferson

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Morgan Walker		Morgan@blizzardlawfirm.com	1/7/2022 2:02:19 PM	SENT
Sarah Durham		sarah@blizzardlawfirm.com	1/7/2022 2:02:19 PM	SENT
Yazmin Flores		yazmin@blizzardlawfirm.com	1/7/2022 2:02:19 PM	SENT

Associated Case Party: The State of Texas

<b>Name</b>	<b>BarNumber</b>	<b>Email</b>	<b>TimestampSubmitted</b>	<b>Status</b>
Britt Lindsey		lindseyb@taylorcountytexas.org	1/7/2022 2:02:19 PM	SENT